## ORIGINAL



SEP 0 9 2002 FCC-MAILROOM

August 22,2002

Commissioner Michael J. Copps Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: Exparrecontact in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-1 16; Universal Service Contribution Reform

Dear Commissioner Copps:

Cargill, Inc. is pleased that the Commission is considering new methods for funding universal service. The current approach, which assesses contribution obligations based on interstate and international revenues, is uneconomic and therefore unsustainable, and should be replaced with a method that assesses contribution obligation based on lines and activated wireless numbers. Cargill, however, strongly objects to a recent proposal made by certain state regulators to freeze the assessments attributable to residential lines.

Cargill, lnc. is one ofmany business customers paying a federal universal service surcharge of between 8% and 10.6%. This revenue-based percentage charge requires high-volume users to pay a disproportionate amount of universal service costs. As a result, the current system discourages use of productivity-enhancing communications technologies and creates a strong financial incentive for high-volume customers to use alternative technologies and service packages to reduce their costs – not a good result as our counhy fights its way out of recession.

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Cargill, Inc. also strongly objects to a recently filed proposal by certain state regulators that would freeze for five years the line and activated wireless number charges applied to residential and single tine business customers. This proposal advances no legitimate public interest objective. Indeed, there is not a shred of evidence that proportionate increases in all line and number USF charges, if needed, would adversely affect residential telephone subscription levels or unfairly burden residential telephone service customers. The state regulators would subject business users alone to added subsidy burdens, burdens that could be quite substantial and that could undermine historic support for universal service subsidies.

Very truly yours,

Manager, Global Network Services

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Phone: 952.984.5525

Fax: 952.984.5909



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